



19th March 2022

To Whom It May Concern,

I am writing on behalf of CARE Suffolk regarding the Statutory Consultation for the Bramford to Twinstead reinforcement proposal.

In relation to this proposal, CARE Suffolk has members in Bramford and Burstall who would bear the brunt of the development in this area. We also have members in Flowton and Sproughton who would bear visual, landscape and cumulative impacts. Thus, we will be considering the impacts in these areas, and will leave other areas of the route to those more suited for those appraisals.

We wish to start by stating that we understand the need for reinforcement works to the transmission system in order for the benefits of the significant offshore wind developments to be fully realised.

However, we do have concerns regarding the proposal based on the information currently available. Our concerns relate specifically to the Bramford and Burstall area of the development, though we understand that some of our concerns are shared along other parts of the route.

Based on the information currently available, our main concerns are:

- Overgrounding at the Bramford end of the proposal
- Cumulative impact at the Bramford end of the proposal
- Detrimental impact to residents in the Orchard Lands area of Burstall

Overgrounding at the Bramford end of the proposal and impact on human and wildlife health

Bramford Substation appears to have been designated as the hub for all large scale Suffolk produced electricity to travel through. We believe there are currently eight existing overhead lines connected to Bramford substation, with additional lines underground. Four 400kv lines, and four 132kv lines. The Bramford to Twinstead line would represent an additional line. We also understand there are two more lines proposed by the NGET – ATEC and ATNC dubbed East Anglian GREEN – which would connect through Bramford. The route options for these have not yet been revealed by NGET.

We note that when the Bramford to Twinstead project was first proposed back in 2013 there were many cases put forward for the full length of cable to be put underground, however NGET still do not propose this.

The EA1 offshore windfarm cable route that connects into Bramford substation was put underground. We understand that Scottish Renewables decided this early on, and that in the decision letter for the project it states “the Secretary of State is aware of the potential for Electric and Magnetic Fields (EMF) to have direct and indirect effects on human health... He is also aware that mitigation is available for such effects through the burying of cables...”

With so many overhead cable lines already converging into the area, further overhead cabling presents even greater cumulative, and unnecessary, risks of EMF on the health of nearby residents and wildlife.

We also wish to raise the concern of over ground development causing an entrapment danger to wildlife. CARE Suffolk was sent video footage of a Roe deer that had become enclosed by the maze of fencing around the existing electrical infrastructure at Bramford substation, and was subsequently injured in its failure to escape. (This video footage is publicly available on our website with permission from the nearby resident who had to intervene to help the

deer.¹) This is permanent fencing. With further over ground development and more permanent fencing, this will only further curtail their natural routes and exacerbate the issue.

We understand that there would be short term issues for wildlife during the construction phase, but also understand this would be present regardless of whether the cables were on overhead pylons or underground. However, fully undergrounding the route would mitigate against the health risks of EMF and reduce the long term danger to wildlife.

Cumulative impact at the Bramford end of the proposal

We noted in the previous point that there is already a significant amount of overhead cable infrastructure in the Bramford area. In addition to this, there are a significant number of other developments in the near vicinity of this development, as listed in the Preliminary Environmental Information Report Appendix 15.3.

However, under “Major Developments within 10km of the project” two notable applications are missing from the list.

DC/21/04711 – EDF Renewables – Tye Lane Solar Farm – 82ha solar farm north of Tye Lane, Bramford. This application has been submitted but is not yet decided.

DC/21/05468 – Pigeon Investment – 100MW Battery Storage east of Bramford Substation. This application has been submitted but is not yet decided.

Also since the Public Consultation was opened, we note the application relating to DC/21/02958 has been submitted to the Babergh & Mid Suffolk District Council. At the time of submitting this response the application numbers have not been published.

Appendix 15.3 for DC/20/05895, DC/21/00060 and DC/21/02958 are all solar farms, and the conclusion is that the proximity of these to the proposed development would result in cumulative impacts, particularly on landscape and visual. DC/21/04711, also for a solar farm and in such close proximity, would also have cumulative impacts. The close proximity of DC/21/05468 also gives rise to potential cumulative impacts.

The below map shows the solar farms and battery storage mentioned.

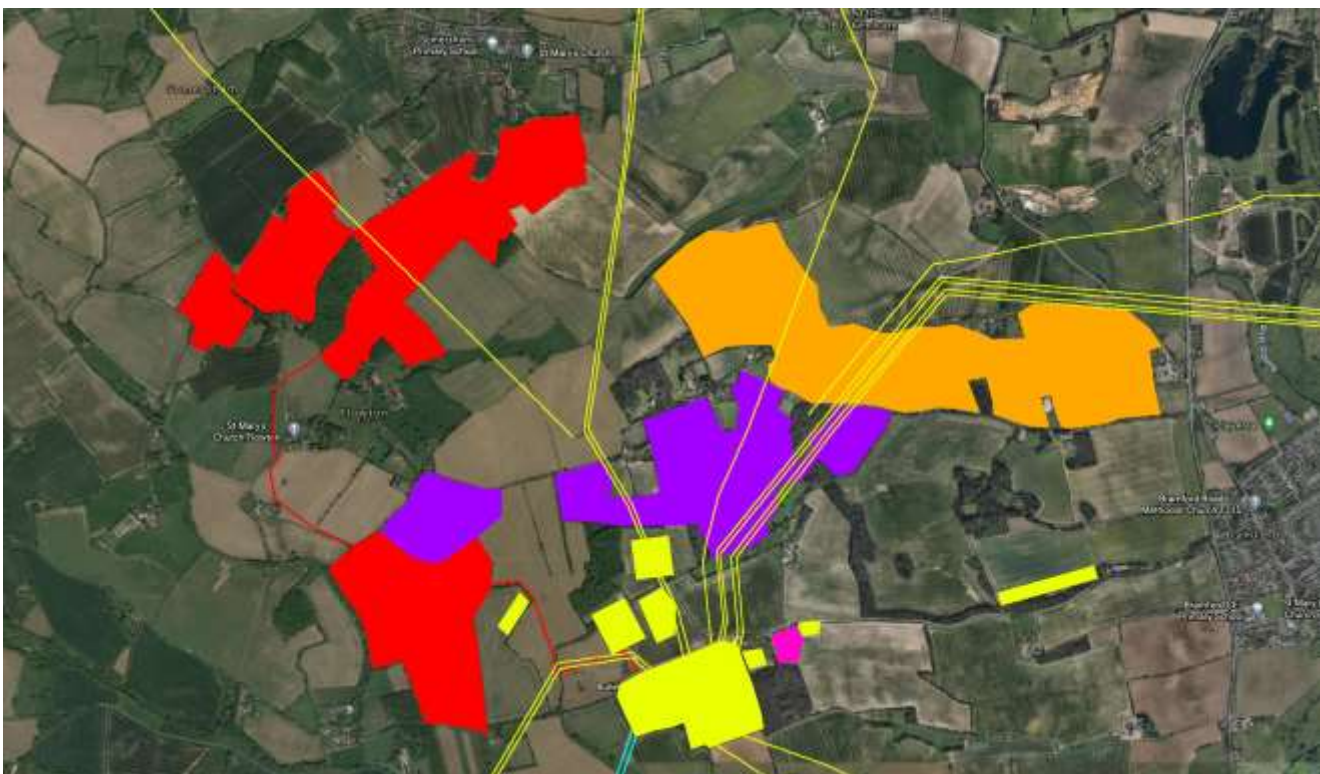
Red is DC/20/05895 & DC/21/00060

Orange is DC/21/04711

Purple is DC/21/02958

Pink is DC/21/05468

The largest of the yellow blocks is that of Bramford Substation and the thin yellow lines represent the existing overhead pylons and cables. Other yellow areas represent existing approved developments, whether built or not.



¹ <http://solar.caresuffolk.org/deer-and-the-solar-farms/>

The combination of these proposed developments would give rise to a significantly changed landscape alongside the proposed development of the Bramford to Twinstead line. We note that the cabling for the EA1 project was fully underground, with the mitigation on the landscape being a key factor for this decision.

Detrimental impact to residents in the Orchard Lands area of Burstall

We note from the latest maps with incredulity the proposal on residents in the Orchard Lands area of Burstall. Residents already have one line to the north, but the proposal is to put the second line not alongside it, but to the south of Orchard Lands. This would encircle the residents, including members of CARE Suffolk, with 400kV overhead lines and pylons.

This area is already highly sensitive to development due to the proximity of one set of overhead lines and pylons. The adverse landscape and human health aspects, discussed above, are already significant here.

NPS EN-1 paragraph 4.2.6 states that the Secretary of State should consider how the *“accumulation of, and interrelationship between effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.”*

Further, the NPS EN-1 paragraph 4.2.2 states *“To consider the potential effects, including benefits, of a proposal for a project, the IPC will find it helpful if the applicant sets out information on the likely significant social and economic effects of the development, and shows how any likely significant negative effects would be avoided or mitigated.”*

We were unable to find any explanation as to how these likely significant negative effects would be avoided or mitigated.

We understand NG insistence that the entire route would not receive funding to be fully undergrounded. But not to propose to underground even one of the two lines around Orchard Lands seems completely illogical and contrary to policy guidance about avoiding and mitigating significant negative effects.

We ask that the following two options be considered instead of the new overhead line to the south:

1. Two overhead lines to run parallel to each other to the north of Orchard Lands as a way to mitigate the impact on the area.
2. The existing routes planned for both lines remain as is, one north and one south, but the southern line is put underground as a way to avoid the impact of the southern line on Orchard Lands.

We would prefer option 2, as this would also avoid the landscape and visual impacts on the local and wider area, and the impacts on human health as mentioned above on the local area.

Summary

In conclusion we understand the need for the new cable route, but we urge NGET to reconsider the longer term and wider benefits of undergrounding the cable route, particularly around the Orchard Lands area, and hope to see this approach taken when the application is submitted to PINS later this year.

Yours sincerely,



Samantha Main

Chair